

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

|  |   |                      |
|--|---|----------------------|
| KIRK RAAB,                               | ) |                      |
| Plaintiff,                               | ) | Case No.: 08 C 50087 |
| v.                                       | ) | Judge Reinhard       |
|  | ) |                      |
| COUNTY OF JO DAVIESS, JO DAVIESS         | ) | Magistrate Mahoney   |
| COUNTY SHERIFF'S OFFICE, SHERIFF         | ) |                      |
| LEO HEFEL in his official capacity as    | ) |                      |
| Sheriff of Jo Daviess County and his     | ) |                      |
| Individual capacity, CHIEF DEPUTY        | ) |                      |
| COLIN FULRATH, in his official capacity  | ) |                      |
| DONALD SCHWEIHS, in his official         | ) |                      |
| Capacity as County of Jo Daviess Public  | ) |                      |
| Defender and in his individual capacity, | ) |                      |
| Defendants.                              | ) |                      |

**NOTICE OF MOTION**

To: All Attorneys of Record

YOU ARE HEREBY NOTIFIED that on the **16<sup>th</sup> day of July, 2008, at 1:30 p.m.**, we shall appear before the Honorable Judge P. Michael Mahoney in courtroom 206 usually occupied by him at the U.S. District Court, 211 S. Court Street, Rockford, Illinois, and shall present the Defendants' Motion to Dismiss at which time and place you may appear if you wish to do so.

COUNTY OF JO DAVIESS, JO DAVIESS  
COUNTY SHERIFF'S OFFICE, SHERIFF LEO  
HEFEL, CHIEF DEPUTY COLIN FULRATH,  
DONALD SCHWEIHS

By: s/Julie A. Bruch  
Julie A. Bruch # 6215813  
O'Halloran Kosoff Geitner & Cook, LLC  
650 Dundee Road, Suite 475  
Northbrook, Illinois 60062  
Telephone: (847) 291-0200  
Fax: (847) 291-9230  
E-mail: [jbruch@okgc.com](mailto:jbruch@okgc.com)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION**

|  |   |                          |
|--|---|--------------------------|
| KIRK RAAB,                                 | ) |                          |
|  | ) |                          |
| Plaintiff,                                 | ) | Case No.: 08 c 50087     |
|  | ) |                          |
| v.   | ) | Judge Reinhard           |
| COUNTY OF JO DAVIESS, JO DAVIESS)          |   | Magistrate Judge Mahoney |
| COUNTY SHERIFF'S OFFICE, SHERIFF)          |   |                          |
| LEO HEFEL in his official capacity as      | ) |                          |
| Sheriff of Jo Daviess County and his       | ) |                          |
| Individual capacity, CHIEF DEPUTY          | ) |                          |
| COLIN FULRATH, in his official             | ) |                          |
| capacity DONALD SCHWEIHS, in his           | ) |                          |
| official Capacity as County of Jo Daviess) |   |                          |
| Public Defender and in his individual      | ) |                          |
| capacity,                                  | ) |                          |
| Defendants.                                | ) |                          |

**CERTIFICATE OF SERVICE**

I hereby certify that on July 3, 2008, I electronically filed Defendants' Notice of Motion with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Martin A. Dolan  
[mdolan@dolanlegal.com](mailto:mdolan@dolanlegal.com)

Mark A. Rouleau  
[rouleau-law@insightbb.com](mailto:rouleau-law@insightbb.com)

Myco T. Dang  
[mdang@dolanlegal.com](mailto:mdang@dolanlegal.com)

COUNTY OF JO DAVIESS, JO DAVIESS  
COUNTY SHERIFF'S OFFICE, SHERIFF LEO  
HEFEL, CHIEF DEPUTY COLIN FULRATH,  
DONALD SCHWEIHS

By: s/Julie A. Bruch  
Julie A. Bruch # 6215813  
O'Halloran Kosoff Geitner & Cook, LLC  
650 Dundee Road, Suite 475  
Northbrook, Illinois 60062  
Telephone: (847) 291-0200  
Fax: (847) 291-9230